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Attorneys for Defendant
SAGE INTACCT, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HANTZ SOFTWARE, LLC., a Michigan
Limited Liability Company,

Plaintiff,

v.

SAGE INTACCT, INC., a Delaware Corporation,

Defendant.

Case No. 4:21-cv-01987-HSG

**JOINT STIPULATION AND ORDER FOR
EXTENSION OF MOTION TO DISMISS
BRIEFING SCHEDULE AND
EXTENSION OF TIME TO FILE
AMENDED COMPLAINT**

Under Local Rule 6-2, Plaintiff Hantz Software, LLC's ("Hantz") and Defendant Sage
Intacct, Inc. ("Sage"), by and through their respective undersigned counsel, stipulate as follows:

1 WHEREAS, Sage filed a Motion to Dismiss Complaint Pursuant to Fed. R. Civ. P. 12
2 (b)(6) in the present lawsuit on May 13, 2021;

3 WHEREAS, on May 21, 2021, the Court granted the parties' stipulation to extend the time
4 for Hantz to respond to the Motion from May 27, 2021 to June 3, 2021 and for Sage to reply from
5 June 3, 2021 to June 10, 2021 (Dkt. No. 35);

6 WHEREAS, under Fed. R. Civ. P. 15(a)(1)(B), the deadline for Hantz to file an Amended
7 Complaint as a matter of course is June 3, 2021.

8 WHEREAS, Sage does not oppose Hantz's request for a 7-day extension of time for Hantz
9 to file a response to the Motion from June 3, 2021 to June 10, 2021 and for Sage to file a reply
10 from June 10, 2021 to June 17, 2021 and a 7-day extension of time for Hantz to file an Amended
11 Complaint from June 3, 2021 to June 10, 2021;

12 WHEREAS, this extension of time will not alter the date of any event or any deadline that
13 the Court has already fixed, including the July 29, 2021 hearing date for the Motion; and

14 THEREFORE, IT IS HEREBY STIPULATED that Hantz shall have up to and including
15 June 10, 2021 to file a response to Sage's Motion to Dismiss and Sage shall have up to and
16 including June 17, 2021 to file its reply to Hantz's response. Hantz also shall have up to and
17 including June 10, 2021 to file an Amended Complaint. The parties respectfully jointly request
18 that the Court issue an order modifying the motion to dismiss briefing schedule and the deadline
19 to file an Amended Complaint in this case accordingly.

20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

21 Dated: June 3, 2021

HUDNELL LAW GROUP P.C.

22
23 By: /s/Lewis E. Hudnell, III
24 Lewis E. Hudnell, III

25 Attorney for Plaintiff
26 HANTZ SOFTWARE, LLC

1 Dated: June 3, 2021

FISH & RICHARDSON P.C.

2
3 By: /s/Robert Courtney (with permission)
4 Robert Courtney

5 Attorney for Defendant
6 SAGE INTACCT, INC.
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28 3 JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER FOR EXTENSION
OF MOTION TO DISMISS BRIEFING SCHEDULE AND EXTENSION
OF TIME TO FILE AMENDED COMPLAINT

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ATTESTATION

Under Civ. Local Rule 5.1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from counsel for Sage.

Dated: June 3, 2021


HUDNELL LAW GROUP P.C.

By: /s/Lewis E. Hudnell, III
Lewis E. Hudnell, III

Attorney for Plaintiff
HANTZ SOFTWARE, LLC

1 IT IS SO ORDERED.

2
3
4 Dated: 6/3/2021


Hon. Haywood S. Gilliam, Jr.
United States District Court Judge